

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**EVA WILLIAMS,  
PLAINTIFF,**

**v.**

**GREATER GEORGIA LIFE,  
INSURANCE COMPANY,  
DEFENDANT.**

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**CASE NO: 1:06-CV-387-CSC**

**Plaintiff's Response to Motion for Summary Judgment**

**COMES NOW**, the Plaintiff, Eva Williams, and pursuant to Rule 56 of the Federal Rules of Civil Procedure, hereby responds to the Motion for Summary Judgment filed by the Defendant, Great Georgia Life Insurance Company, and states that there is a genuine issue of material fact and that that Greater Georgia Life Insurance Company is not entitled to Judgment as a matter of law. The Plaintiff's response is based on the applicable law, all pleadings, all papers on file and all evidence set forth in Plaintiff's Evidentiary Submission in Response to Motion for summary Judgment.

Respectfully submitted this 12th day of December, 2006.

/s/Samuel L. Adams  
Samuel L. Adams (ADA017)  
Attorney for Plaintiff  
P.O. Box 1690  
Dothan, AL 36302  
334-792-0965

**CERTIFICATE OF SERVICE**

I certify that I have served a copy of the above listed parties, by placing a copy of the same in the United States mail, correctly addressed and first-class postage prepaid on this 12th day of December, 2006.

Michael L. Lucas (LUC004)  
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420 North 20<sup>th</sup> Street  
Birmingham, Alabama 35203

/s/Samuel L. Adams  
Samuel L. Adams